CITY OF
LA MESA
JEWEL of the HILLS

PUBLIC WORKS DEPARTMENT

May 28, 2019

San Diego Regional Water Quality Control Board
2375 Northside Dr. Ste 100
San Diego, CA 92108

Subject: Proposed Basin Plan Amendment to Incorporate Biological Objectives, PIN: CW-825417
Attn: Chad Loflen

Comment: The Proposed BPA should recognize the limitations of watercourse segments in highly developed landscapes.

Urban areas such as the City of La Mesa contain watercourses which have been drastically impacted by population growth and development. Many watercourses were modified decades ago for flood control purposes, with commercial/residential properties developing directly adjacent. In many instances the waterway is squeezed between transportation right of way and existing developments. The BPA needs additional language within *Chapter 4 Section V. Permitting* recognizing this fact. Engineered waterways will always be significantly impacted by adjacent land use; and a 0.79 CSCI score will not be attainable in most urban situations.

The CSCI analysis tool uses analogous sites within the statewide reference pool to derive its score; while many modified channels in urbanized settings, by their very nature, do not have appropriate analogs within the reference pool. A different approach is needed in regard to these situations. At the very least, language should be added to *Chapter 4 Section V* of the BPA recognizing the practical numeric limitations for existing urban waterways and/or urban waterway restoration projects.

The April 2017 Science Panel Report for the Statewide BioStimulatory/BioIntegrity Project and the March 2019 review of the Channels and Developed Landscapes Manuscript both supported the consideration of different thresholds for constrained channels. Reasonable evaluation methods should be available related to the context of surrounding land use which the existing watercourse is functioning.

Unattainable numeric criteria may discourage jurisdictions from tackling expensive restoration projects in situations whereby the increase in CSCI score may be negligible; and regulatory relief regarding numerical biological objectives for the given watercourse may not be existent.

Sincerely,

Joe Kuhn
Storm Water Program Manager
City of La Mesa

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